



HON. SYLVIA O. HINDS-RADIX  
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THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

Application GRANTED. Defendant shall file its opposition and any cross-motion by **February 14, 2024**. In light of this extension, Plaintiff shall file its opposition and reply no later than **March 6, 2024**. Defendant shall file its reply no later than **March 20, 2024**. No further extensions will be granted absent extraordinary circumstances.

January 24, 2024

Dated: January 25, 2024  
New York, New York

**VIA ECF**

Hon. Lorna G. Schofield  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Re: *A.P. v. N.Y.C. Dep't of Education*, 23-cv-6651 (LGS)(RWL)

Dear Judge Schofield:

I am a Special Assistant Corporation Counsel in the Office of Corporation Counsel, the Honorable Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.*, as well as for this action.

I write to respectfully request that the February 9, 2024 deadline for Defendant to file its opposition to Plaintiff's motion for fees be extended by five days to February 14, 2024. Plaintiff consents to this request. This is the first request for an extension of the opposition papers' filing deadline.

The requested extension is necessary to allow Defendant additional time to review Plaintiff's revised and newly re-submitted motion papers. Additionally, Defendant notes that had it received Plaintiff's request for an extension to re-file its motion papers, Defendant would have consented.

Accordingly, Defendant respectfully requests that its deadline for submitting opposition be extended to February 14, 2024.

Thank you for considering this request.

Respectfully submitted,

/s/  
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Martha Nimmer, Esq.

Special Assistant Corporation Counsel

cc: Francesca Antorino, Esq. (via ECF)